ALB:CPK F. #2014R01966

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- against -

FRANK JOHN PARASMO,

Defendant.

THE GRAND JURY CHARGES:

IN CLERK'S OFFICE
U.S. DISTRICT CO. D.N.Y.

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LONG ISLAND OFFICE

CR 19 001

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C), 853(a) and 853(p); T. 18, U.S.C., §§ 2 and 3551 et seq.)

SPATT, J.

TOMLINSON MI

COUNTS ONE THROUGH THIRTY-FIVE (Distribution of Oxycodone)

1. On or about the dates set forth below, within the Eastern District of New York, the defendant FRANK JOHN PARASMO, together with others, did knowingly and intentionally distribute one or more substances containing oxycodone and containing hydrocodone, Schedule II controlled substances, to patients whose identities are known to the Grand Jury, as set forth below, without authorization pursuant to Title 21, United States Code, Chapter 13, Subchapter I, to wit: the authorization for an individual practitioner acting in the usual course of his professional practice to issue a prescription for a controlled substance for a legitimate medical purpose and to dispense a Schedule II controlled substance.

| COUNT | PATIENT | DATE | NUMBER OF PILLS | OXYCODONE PER PILL UNLESS INDICATED AS HYDROCODONE |
|-----------|---------|-------------------|--------------------|--|
| ONE | F.C. | January 7, 2014 | 480 | 30 milligrams (240) 15 milligrams (240) |
| TWO | W.L. | May 8, 2014 | 150 | 30 milligrams |
| THREE | W.L. | July 10, 2014 | 150 | 30 milligrams |
| FOUR | W.L. | February 2, 2015 | 150 | 30 milligrams |
| FIVE | W.L. | December 1, 2014 | 150 | 30 milligrams |
| SIX | S.F. | June 2, 2014 | 120 | 5 milligrams |
| SEVEN | S.F. | July 7, 2015 | 120 | 5 milligrams |
| EIGHT | B.H. | November 14, 2014 | 580 | 30 milligrams (500) 15 milligrams (80) |
| NINE | В.Н. | December 12, 2014 | 580 | 30 milligrams (500) 15 milligrams (80) |
| TEN | B.H. | April 21, 2015 | 580 | 30 milligrams (500) 15 milligrams (80) |
| ELEVEN | L.F-A. | June 25, 2015 | 105 | 30 milligrams |
| TWELVE | L.F-A. | December 15, 2015 | 63 60 | 20 milligrams 40 milligrams |
| THIRTEEN | J.L. | June 26, 2014 | 240 | 30 milligrams |
| FOURTEEN | J.L. | January 15, 2015 | 240 | 30 milligrams |
| FIFTEEN | M.M. 1 | May 6, 2015 | 240 | 30 milligrams (180) 15 milligrams (60) |
| SIXTEEN | L.M. | December 28, 2015 | 120 | 30 milligrams |
| SEVENTEEN | L.M. | June 18, 2015 | 120 | 30 milligrams |
| EIGHTEEN | C.P. | December 4, 2014 | 240 | 15 milligrams |
| NINETEEN | R.O. | February 6, 2015 | 150 | 30 milligrams |

| COUNT | PATIENT | DATE | NUMBER OF PILLS | OXYCODONE PER PILL UNLESS INDICATED AS HYDROCODONE |
|--------------|---------|-------------------|--------------------|--|
| TWENTY | R.O. | June 26, 2015 | 120 | 30 milligrams |
| TWENTY-ONE | P.P. | April 2, 2015 | 120 | 10 milligrams (Hydrocodone) |
| TWENTY-TWO | M.S. | January 13, 2015 | 150 | 30 milligrams |
| TWENTY-THREE | M.S. | December 29, 2015 | 90 | 30 milligrams |
| TWENTY-FOUR | M.M. 2 | January 14, 2015 | 150 | 30 milligrams |
| TWENTY-FIVE | M.M. 2 | August 20, 2015 | 90 | 20 milligrams |
| TWENTY-SIX | S.M. | January 14, 2015 | 240 | 30 milligrams |
| TWENTY-SEVEN | S.M. | August 20, 2015 | 150 | 30 milligrams |
| TWENTY-EIGHT | M.R. | January 16, 2015 | 180 | 30 milligrams |
| TWENTY-NINE | M.R. | March 30, 2015 | 120 | 30 milligrams |
| THIRTY | M.R. | April 23, 2015 | 90 | 30 milligrams |
| THIRTY-ONE | A.R. | June 12, 2015 | 180 | 30 milligrams |
| THIRTY-TWO | O.J. | July 16, 2015 | 120 | 30 milligrams |
| THIRTY-THREE | L.D. | May 28, 2015 | 20 | 30 milligrams |
| THIRTY-FOUR | R.W. | December 12, 2014 | 180 | 30 milligrams |
| THIRTY-FIVE | D.W. | February 22, 2015 | 180 | 5 milligrams |

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18,

United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO ALL COUNTS

- 2. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses, and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.
- 3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the court;
 - (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL

FOREPERSON

RICHARD P. DONOGHUE UNITED STATES ATTORNEY

EASTERN DISTRICT OF NEW YORK

F.#: 2014R01966 FORM DBD-34 JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

FRANK JOHN PARASMO,

Defendant.

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C), 853(a) and 853(p);T. 18, U.S.C., §§ 2 and 3551 et seq.)

| A true bill. Francis P. Harlowara | Foreperson |
|-----------------------------------|------------|
| Filed in open courtthisday, | |
| of A.D. 20 | |
| | Clerk |
| Bail, \$ | |
| | |

Charles P. Kelly, Assistant U.S. Attorney (631) 715-7866